

## **EXHIBIT "B"**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*Caption in Compliance with D.N.J. LBR 9004-1*

Edmond M. George, Esquire  
Angela L. Mastrangelo, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
1120 Route 73, Suite 420  
Mt. Laurel, NJ 08054  
(856) 795-3300  
[edmond.george@obermayer.com](mailto:edmond.george@obermayer.com)  
[angela.mastrangelo@obermayer.com](mailto:angela.mastrangelo@obermayer.com)  
*Attorneys for Arlene Pero and Jill Swersky*

**In re:**

**PRINCETON AVENUE GROUP, INC.,**  
  
**Debtor.**

**Case No.: 19-19841 (JNP)**

**Chapter 11**

**NOTICE OF DEPOSITION OF DEBTOR PURSUANT TO  
FED R. BANKR. P. 7030 AND FED. R. CIV. P. 30(b)(6)**

To: Debtor, Princeton Avenue Group, Inc.  
c/o Ellen M. McDowell, Esquire  
McDowell Law, PC  
46 West Main Street  
Maple Shade, NJ 08052

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30(b)(6), made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7030, Creditors, Arlene Pero and Jill Swersky, will take the oral deposition of the designated representative of Princeton Avenue Group, Inc. (the "Debtor"), beginning at **9:30 AM on Tuesday, July 28, 2020** via Remote Video Deposition. Debtor is directed, pursuant to Fed. R. Civ. P. 30(b)(6), to designate one or more officers, directors, managing agents, or other persons who are knowledgeable to testify with respect to each of the matters set forth herein. If Debtor must designate more than one person in order to address adequately the matters specified herein, then, unless the parties agree otherwise, the oral deposition of Debtor will continue from day to day, with a minimum of one, (excluding Saturdays, Sundays, and holidays) during the hours of 9:30 a.m. until 4:30 p.m. (with one hour

break for lunch) until completed. The deposition upon oral examination will be before a person authorized by the laws of the State of New Jersey to administer oaths via Zoom.

The matters for examination are:

1. The formation, operations, assets, liabilities, income, and cash flow of the Debtor from inception to date.
2. The relationship between the Debtor and Tavro13, Inc., including any agreements, leases, joint liabilities, and rents collected from Tavro13, Inc.
3. The preparation and filing of income tax returns of the Debtor since formation.
4. The purchase and financing of the real property of the Debtor, including any and all liens attached to said real property.
5. The tax lien on the Debtor's real property that was purchased by US Bank and its efforts to foreclose on the Debtor's real property.
6. The preparation of financial projections attached to the Debtor's Third Amended Disclosure Statement.
7. Loans made by Arlene Pero to the Debtor, and Debtor's objection to the Proof of Claim of Arlene Pero.
8. Loans made by Jill Swesky to the Debtor, mortgage note, and Debtor's objection to the Secured Claim of Jill Swersky.
9. Loan(s) made by Zois Tzitzifas to the Debtor totaling \$145,000.00.
10. Loan(s) made by Effie Tzitzifas to the Debtor totaling \$97,000.00.
11. Loan(s) made by Konstantinos Tzitzifas to the Debtor totaling \$245,500.00.
12. The unsecured claims listed in the Debtor's Amended Schedule E/F, including Metromedia Energy and Marriott Vacation Club.
13. Any communications between representatives of the Debtor and its unsecured creditors regarding monies owed.
14. The value of the Debtor's real property.

Debtor's designated representative(s) is directed to bring with him/her the following documents:

1. Any and all documents related to the Debtor's payments (a) Arlene Pero and (b) Jill Swersky for repayment of the Debtor's loans.
2. Any and all documents related to the loans made by (a) Zois Tzitzifas; (b) Effie Tzitzifas; and (c) Konstantinos Tzitzifas to the Debtor.
3. Copies of the Debtor's tax returns for the years 2011 through the present.
4. Any and all documents related to US Bank and its efforts to foreclose on the Debtor's real property.

any and all documents, whether written or electronic, pertaining to the above listed matters, if not already produced by Debtor in this litigation.

Dated: July 30, 2020

By: /s/ Angela L. Mastrangelo  
Edmond M. George, Esquire  
Angela L. Mastrangelo, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
1120 Route 73, Suite 420  
Mt. Laurel, NJ 08054  
*Counsel to Arlene Pero and Jill Swersky*